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7		
8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
10	WESTERN DIVISION - LOS ANGELES	
11		
12	ST. LUKE SCHOOL OF MEDICINE; DR. JERROLL B.R. DOLPHIN, on behalf of himself and all other similarly	Case No. 2:10-cv-01791-RGK-SH
13	situated, as applicable; DR. ROBERT	MOTION TO DISMISS BY
14	FARMER, on behalf of himself and all other similarly situated, as applicable,	DEFENDANTS STATE OF OREGON AND OREGON OFFICE OF DEGREE
15	Plaintiffs,	AUTHORIZATION PURSUANT TO F.R.C.P. 12(B)(2)&(6)
16	v.	
17		DATE: July 26, 2010
18	REPUBLIC OF LIBERIA; MINISTRY OF HEALTH, a Liberian Governmental Agency; MINISTRY OF	TIME: 9:00 a.m. JUDGE: Honorable R. Gary Klausner
19	Agency; MINISTRY OF EDUCATION, a Liberian Governmental Agency; LIBERIAN	
20	MEDICAL BOARD, a Liberian	
21	Governmental Agency; NATIONAL COMMISSION ON HIGHER	
22	EDUCATION, a Liberian Governmental Agency, NATIONAL	
23	TRANSITIONAL LEGISLATIVE ASSEMBLY, a Liberian Governmental Agency; DR. ISAAC ROLAND;	
24	MOHAMMED SHERIFF; DR. BENSON BARH; DR. GEORGE	
25	Dia Diagon Diagn, Dia Giboroli	

AOTION TO DISMISS BY DEFENDANTS STATE OF OREGON AND OREGON OFFICE OF DEGREE AUTHORIZATION PURSUANT TO F.R.C.P. 12(B)(2)&(6)

1 2 3 4	GOLLIN; EDUCATION COMMISSION FOR FOREIGN MEDICAL GRADUATES, a Pennsylvania Non-Profit organization; FOUNDATION FOR ADVANCEMENT OF INTERNATIONAL EDUCATION AND RESEARCH, a Pennsylvania Non-Profit organization; UNIVERSITY		
5 6	AND RESEARCH, a Pennsylvania Non-Profit organization; UNIVERSITY OF ILLINOIS-URBAN, an Illinois Institution of Higher Learning; STATE OF OREGON, Office of Degree Authorization,		
7	Defendants.		
8	This motion is made following the conference of counsel pursuant to		
9	L.R. 7-3 which took place on June 1, 2010.		
10			
11	Defendants State of Oregon and the Oregon Office of Degree Authorization		
12	move this Court for an order dismissing Plaintiffs' claims pursuant to 1) Fed. R.		
13	Civ. Pro. 12(b)(2) on the basis of insufficient personal jurisdiction and 2) Fed. R.		
	Civ. Pro. 12(b)(6), for failing to state facts upon which relief can be granted. The		
14	motion is supported by the accompanying memorandum of law.		
15	DATED this 2 nd day of June, 2010.		
16	Respectfully submitted,		
17	JOHN R. KROGER		
18	Attorney General		
19	1.417 %:		
20	SETH T. KARPINSKI Cal. Bar #137748		
21	Senior Assistant Attorney General Trial Attorney		
22	Tel (503)947-4700 Fax (503) 947-4792		
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24			
25			
AOTION TO DISMISS BY DEFENDANTS STATE OF OREGON AND OREGON 26 OFFICE OF DECREE ALITHOPIZATION PURSUANT TO F.R.C.B.			

OFFICE OF DEGREE AUTHORIZATION PURSUANT TO F.R.C.P. 12(B)(2)&(6)

CERTIFICATE OF SERVICE

I certify that on June 2, 2010, I served the foregoing MOTION TO DISMISS BY DEFENDANTS STATE OF OREGON AND OREGON OFFICE OF DEGREE AUTHORIZATION PURSUANT TO F.R.C.P. 12(B)(2)&(6) upon the parties hereto by the method indicated below, and addressed to the following: Thaddeus Julian Culpepper, SBN HAND DELIVERY MAIL DELIVERY 220194 Culpepper Law Groupe **OVERNIGHT MAIL** 556 South Fair Oaks Avenue, Suite 302 TELECOPY (FAX) 626-628-3083 Pasadena, CA 91105 E-MAIL culpepper@alumni.pitt.edu 626-786-2779

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Of Attorneys for Plaintiffs